

REMARKS

Claims 1-10 were pending in the above-identified application. Claims 1-10 were rejected. With this Amendment, claims 1 and 5 are amended, claim 10 is cancelled, and claims 18 and 19 are added. Accordingly, claims 1-9, 18, and 19 are at issue.

I. 35 U.S.C. § 102 Anticipation Rejection of Claims

Claims 1, 5, and 10 were rejected under 35 U.S.C. § 102(b) as being anticipated by *Watanbe et al.* (Japanese Publication No. H09-055487). Applicants respectfully traverse this rejection.

Claim 1 is directed a solid-state image pickup device. The solid-state image pickup device comprises a circuit board, a sensor package, a seal, and an optical unit. The circuit board has a first opening. The sensor package has a second opening and includes a chip of a solid-state image pickup element with a light-receiving surface. The sensor package is disposed at one surface of the circuit board so that the light-receiving surface of the chip of the solid-state image pickup element opposes the first opening of the circuit board. The seal covers entirely the second opening and is adhered to the sensor package for sealing in the solid-state image pickup element. The optical unit is disposed at the other surface of the circuit board so that incident light is focused on the light-receiving surface.

Watanbe et al. is directed to a mounting approach of a solid-state image sensor. Unlike claim 1, as amended, *Watanbe* does not disclose or suggest “a sensor package with a second opening” and “a seal covering entirely said second opening and adhered to the sensor package for sealing in the solid-state image pickup element.” Rather, *Watanbe* only discloses a transparence plate 19 which “staddles” the opening 17 of the frame 16. (Par. 12.) In *Watanbe*, the transparence plate 19 is formed shorter than the width of two sides, forming openings along two sides of the frame 16. *Id.* This is because, in *Watanbe*, a transparence resin has to be filled

in between the sensor chip 11 and transparence plate 19. (Par. 13.) This is contrary to the claimed invention, where the seal covers the entire opening of the sensor package to prevent matter from contacting the solid-state image pickup element.

Therefore, since *Watanbe* does not disclose or suggest “a seal covering entirely said second opening and adhered to the sensor package for sealing in the solid-state image pickup element” as recited by amended claim 1, *Watanbe* does not anticipate claim 1. Accordingly, Applicants respectfully request this rejection be withdrawn.

For the same reasons as described above, *Watanbe* does not anticipate independent claim 5. Claims 2-4, 9, and 18 depend from independent claim 1. Claims 6-8 and 19 depend from independent claim 5. Accordingly, Applicants submit that all claims are allowable over the cited prior art .

II. 35 U.S.C. § 103 Obviousness Rejection of Claims

Claims 2, 3, 6 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Watanbe et al.* in view of *Ackland et al.* (Non-Patent Literature). Claims 4 and 8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Watanbe* in view of *Tullis* (U.S. Patent No. 6,535,243). Claim 9 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Watanbe et al.* Applicants respectfully traverse these rejection.

For at least the reasons as described above, *Watanbe* in view of *Ackland* or *Tullis* does not render obvious claims 2-4 and 6-9.

III. Conclusion

In view of the above amendments and remarks, Applicants submit that all claims are clearly allowable over the cited prior art, and respectfully request early and favorable notification to that effect.

Respectfully submitted,

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